

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

William A. Brownlee, Sr.,
Debtor.

Case No. 24-10598-PMM

Chapter 13

Related to ECF No. 42

Debtor's Objection to Motion for Relief from Stay filed by Citibank, N.A.

AND NOW, Debtor William A. Brownlee, Sr., by and through his attorney, hereby objects to the Motion for Relief from Stay filed by Citibank, N.A., for the following reasons:

1. The alleged arrearage is inconsequential.
2. The Debtor can cure the alleged arrearage through an amended chapter 13 plan.

NOW, THEREFORE, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in his favor as may be necessary and proper under the law.

Date: August 6, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
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Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Citibank, N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: August 6, 2024

/s/ Michael A. Cibik
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

William A. Brownlee, Sr.,

Debtor.

Case No. 24-10598-PMM

Chapter 13

Related to ECF No. 42

Order Denying Motion for Relief from Stay filed by Citibank, N.A.

AND NOW, upon consideration of the Motion for Relief from Stay filed by Citibank, N.A., and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date:

Patricia M. Mayer
U.S. Bankruptcy Judge